

IN THE UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

GREGORY THOMAS BERRY, et al.,

:

Plaintiffs,

:

v.

:

Civil Action No.: 3:11CV754

LEXISNEXIS RISK & INFORMATION
ANALYTICS GROUP, INC., et al.,

:

:

Defendants.

ORDER GRANTING EMERGENCY RELIEF

Class Counsel and Defendants respectfully request that the Court enter the following Order regarding certain statements made by the Watts Guerra firm on its website (<http://bringaclaim.com>) and on television commercials like the one that can be seen at <http://www.ispot.tv/ad/721V/watts-guerra-consumer-report>.

NOW, THEREFORE, IT IS HEREBY ORDERED AND DECREED as follows:

1. Attorney Ryan Thompson ("Thompson"), of the law firm Watts Guerra, L.L.P. ("Watts Guerra"), and Watts Guerra, individually or collectively, shall:
 - a. Take-down any pages concerning, relating to, or describing the proposed settlement of *Berry v. LexisNexis Risk & Information Analytics Group, Inc., et al.* (the "Proposed Settlement") at <http://bringaclaim.com> or any other website owned or controlled by Thompson or Watts Guerra;
 - b. Take-down any videos available on-line or otherwise concerning, relating to, or describing the Proposed Settlement owned or controlled by Thompson or Watts Guerra; and



c. Cease any and all advertising campaigns or other communications concerning, relating to, or describing the Proposed Settlement whether on television, the radio or other media without first complying with paragraph 2 below.

2. Attorney Thompson and Watts Guerra shall meet and confer with Class Counsel prior to their disclosing or using any materials intended to replace the material described in paragraphs 1(a) through (c) above. To the extent that Class Counsel believes that such new material continues to contain misrepresentations or omissions and Attorney Thompson and Watts Guerra refuses to correct those misrepresentations or omissions, Class Counsel and Attorney Thompson and Watts Guerra should report on those disagreements to the Court for further guidance prior to those materials being used or disclosed.

3. Attorney Thompson and Watts Guerra, individually and collectively, shall cause any third-parties owned, managed or controlled by them to comply with this Order.

4. Attorney Thompson and Watts Guerra shall file a certification with the Court that they have complied with the above within five days of the issuance of this Order.

5. Attorney Thompson and Watts Guerra shall be solely responsible for all costs associated with compliance with this Order.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE JAMES R. SPENCER
UNITED STATES DISTRICT JUDGE